



PRIVACY INFORMATION NOTICE FOR WHISTLEBLOWING

HT Italia S.r.l., pursuant to the European Regulation (EU) 2016/679 (hereinafter referred to as the "Regulation" or the more widely known acronym "GDPR") regarding the protection of natural persons concerning the processing of personal data and the free movement of such data, which repeals Directive 95/46/EC, aims to explain to the concerned parties the necessary information regarding the use of personal data processed in the management of any reports of illegal conduct, so-called "Whistleblowing" – in compliance with Legislative Decree No. 24/2023.

Who is the Data Controller

The Data Controller is HT Italia S.r.l. (the "Controller" or the "Company"), VAT number: IT00855260394, headquartered at Via della Boaria n. 40, 48018 Faenza (RA) - Italy. You can contact the Controller for exercising the rights of the concerned parties as provided by the Regulation and for receiving any information regarding the processing of personal data by writing to the following address: privacy@ht.instruments.com.

What personal data we process

"Personal data" refers to any information suitable to directly or indirectly identify a natural person (so-called "Concerned Party").

The personal data processed in managing reports of illegal conduct may concern the reporting parties, any facilitators ("a natural person who assists the reporting person in the reporting process operating within the same work context and whose assistance must be kept confidential"), and/or witnesses indicated in the report and, of course, the reported subjects.

In general, the processing involves common or identifying personal data, but it is not excluded that the report may contain personal information of a different nature.

The process of reporting illegal conduct and the reporting methods are described in the procedure available at <https://www.ht-instruments.it/it-it/whistleblowing/>.

During the management of the reports, the personal data that could be collected are only

those expressly provided by the reporting party, namely:

- Name, surname, and contact information (such as email address or phone number) if provided by the reporting party;
 - Personal data relating to third parties, i.e., the reported subjects;
 - Information about facts and circumstances mentioned in the report that allow for identifying the subject to whom the reported facts are attributed;
 - Other information provided by the reporting party useful for handling the report.
- It remains the case that, in the event of an anonymous report, the reporting party's data will not be processed.

Purpose of processing and legal basis

The personal data collected following the submission of reports regarding illegal conduct or behaviors, acts, or omissions that may harm the public interest or the integrity and image of the Company, pursuant to Legislative Decree No. 24/2023, are processed to manage the reports sent through the activation of the internal reporting channel.

Nature of the provision and consequences of a refusal to provide personal data

Personal data are collected from the concerned party who voluntarily decides to subscribe to the Newsletter service. The provision of data is optional; any refusal or incorrect or insufficient communication of data suitable for completing the request may result in the total or partial inability to carry out the response operations for managing the report as required by law.

Retention period of personal data

Personal data are processed using automated IT tools for the time strictly necessary to achieve the purposes for which they were collected, and in any case, no longer than 5 years from the date of communication of the final outcome of the reporting procedure (Article 14 of Legislative Decree No. 24/2023), in compliance with the confidentiality obligations referred to in Article 12 of Legislative Decree No. 24/2023 and the principles set out in Article 5, paragraph 1, letter e) of Regulation (EU) 2016/679 and Article 3, paragraph 1, letter e) of Legislative Decree No. 51/2018.

Personal data that appear manifestly unnecessary for processing a specific report are not collected, or if collected accidentally, are immediately deleted.

How personal data are processed

The written report is collected on the telematic platform <https://htitalia.smartleaks.cloud>, which ensures that the information is collected directly through the reporting form by the technological manager TeamSystems; no personal data (name, surname, and email address) are mandatory; reports can also be submitted anonymously – and to receive confirmation messages of the report's acknowledgment, an alphanumeric code generated during the report submission must be retained to access and check the report's progress; the confidentiality of the reporting party's identity is guaranteed through encryption

techniques.

The only session cookies used on the web system are "technical" cookies and serve solely to ensure session security. They do not track any personal data.

In any case, the report will be managed by a person within the Company – the head of the Administration function – who is appropriately designated and authorized to process the necessary subsequent actions. For the management of the report, the online platform's technological provider serves as the Data Processor.

Personal data processing is carried out using IT and telematic tools strictly related to the purposes mentioned above and, in any case, with methods suitable for ensuring their security and confidentiality, in compliance with the organizational and technical measures provided by Articles 25 and 32 of the GDPR.

To whom your personal data may be communicated and who may become aware of it

Personal data will only be processed by persons specifically authorized to manage the report and/or by the subjects expressly indicated by Legislative Decree No. 24/2023.

The data will be communicated to recipients belonging to the following categories:

- The Company Management in the event of reports concerning actions or acts attributable to suppliers or third parties, if the internal reporting channel is activated;
- The National Anti-Corruption Authority (ANAC) in case of activation of the external reporting channel, as established by "Deliberation No. 311 of July 12, 2023 - Guidelines on the protection of persons reporting violations of Union law and the protection of persons reporting violations of national regulatory provisions. Procedures for the submission and management of external reports";
- The Judicial Authority.

Furthermore, personal data may be processed by the technological provider and its subcontractors, who provide services for managing the IT system, including server hosting and backup services.

Transfer of personal data outside the European Union

HT Italia S.r.l. does not export personal data outside the European Economic Area for the service of managing reports of illegal conduct; the systems used keep personal data within Italy or the European Union.

The rights of the concerned parties

At any time, it is possible to exercise the rights protecting the concerned parties towards HT Italia S.r.l., the Data Controller, in particular:

- Obtain confirmation of the existence or non-existence of personal data concerning them and its communication in an intelligible form; obtain information about:
 - The purposes and methods of processing;
 - The logic applied in the event of processing carried out with the help of electronic tools;
 - Know the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it as Data Processors or authorized persons;
- Also, obtain:

- Access to the personal data processed by the Company;
- The updating, correction, or, where there is an interest, the deletion of data if possible;
- The portability of the data provided for some services;
- Oppose, in whole or in part, the processing of their personal data in cases expressly permitted by laws or regulations.

Furthermore, complaints can be filed with the Supervisory Authority in the cases and for the effects expressed by the current legislation, with the modalities described on the website of the Data Protection Authority – <https://www.garanteprivacy.it>; mandate can be given to an organization, association, or nonprofit entity duly established under Italian law to file and exercise complaints with the Data Protection Authority on behalf of the concerned party(ies).

The rights mentioned above may be exercised towards the Data Controller by contacting the details provided in point 1 (email: privacy@ht-instruments.com). The Controller will take care of the request and provide the concerned party, without undue delay and in any case no later than one month after receiving the request, with information regarding the action taken in this regard.

The exercise of the rights as a concerned party is free of charge under Article 12 of the GDPR.